

# EXHIBIT C

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May 12, 2017

Via E-Mail

Janis Echenberg  
U.S. Attorney's Office, SDNY  
One St. Andrew's Plaza  
New York, NY 10007

Re: *U.S. v. Alain Kaloyeros*, S.D.N.Y., 16-Cr-00776 (VEC)  
Request for Particulars

Dear Ms. Echenberg:

This firm represents defendant Alain Kaloyeros in the above-referenced matter. We write in response to your May 10, 2017 letter regarding our April 28, 2017 request for particulars and in anticipation of our scheduled May 15, 2017 meet and confer.

First, we reiterate our request for the particulars described in our April 28, 2017 request. These particulars are not an improper request for a preview of the Government's case. Rather, they are necessary for Dr. Kaloyeros to prepare his defense, avoid unfair surprise at trial, and protect him from double jeopardy.

Second, your letter "refers" Dr. Kaloyeros to the communications and records of two individuals and 11 entities (employing hundreds of individuals) and offers non-exhaustive examples of relevant discovery that total over 700,000 pages. Trial is less than six months away. If your position is that discovery is a substitute for particularization, a far more targeted disclosure is necessary.

Third, our request and your letter pre-date the Government's Superseding Indictment filed on May 11, 2017, which contains new allegations. We request that you identify the parties to, and timing and substance of, the e-mails and telephone calls with individuals located in Manhattan, New York that are alleged in Paragraph 26 of the Superseding Indictment.

Finally, we reserve the right to supplement these requests as we review the discovery material and prepare for trial.

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Janis Echenberg  
May 12, 2017  
Page 2

We look forward to speaking with you at our scheduled meet and confer.

Thank you.

Very truly yours,

A handwritten signature in blue ink, appearing to read "M. C. MILLER" followed by "JAN." in a stylized, cursive font.

Michael C. Miller  
*Counsel for Dr. Kaloyerros*

cc: AUSAs Robert Boone, David Zhou, Matthew Podolsky (via e-mail)